

~~United States District Court~~  
~~Southern District of Texas~~  
FILED

UNITED STATES DISTRICT COURT

for the

OCT - 1 2019

## Southern District of Texas

**David J. Bradley, Clerk**

United States of America )  
Kandy Elizabeth Martinez )  
YOB: 1970 )  
United States Citizen )  
Case No. M-19-Z333-M

Defendant(s)

## **CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 30, 2019 in the county of Hidalgo in the  
Southern District of Texas, the defendant(s) violated:

## *Code Section*

### *Offense Description*

knowingly and intentionally possess with intent to distribute approximately 18.48 kilograms of Methamphetamine, a Schedule II substance, and did knowingly and intentionally import approximately 18.48 kilograms of Methamphetamine, a Schedule II controlled substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

Continued on the attached sheet.

Complainant's signature

Approved by Amy L. Greenbaum 10/11/19

Sworn to before me and signed in my presence.

Date: 10/1/2019

8:38 am

*Judge's signature*

City and state: McAllen, Texas

U.S. Magistrate Judge Peter Ormsby

*Printed name and title*

**Attachment "A"**

On September 30, 2019, Homeland Security Investigations (HSI), McAllen, Texas, was notified by Customs and Border Protection (CBP) that Kandy Elizabeth Martinez attempted to enter the United States (U.S.) from Mexico via the Donna Port of Entry in Donna, Texas, as the driver of a red in color 1999 Dodge van displaying Texas license plates 254ZBW. During primary inspection, Martinez told the Customs and Border Protection Officer (CBPO) that she traveled from San Antonio, Texas, to Mexico to purchase Tylenol. The CBPO referred the vehicle for secondary inspection.

During secondary inspection a CBPO narcotics K-9 alerted to the presence of narcotics in the vehicle. CBP conducted an X-ray exam of the vehicle which revealed anomalies in the rear passenger quarter panels and in the spare tire. Further inspection of the quarter panel and spare tire revealed eighteen (18) bundles containing a crystal powdery substance. The crystal powdery substance field tested positive for methamphetamine. The eighteen (18) bundles had a total weigh of 18.48 kilograms of methamphetamine.

HSI McAllen special agents responded to the port of entry to interview Martinez who was advised of her Miranda Warnings which she waived and agreed to answer questions without an attorney present. Martinez stated she was crossing the vehicle to make money. Martinez she was being paid \$3,000.00 to drive the vehicle, which she believed had drugs inside, into the U.S. for a subject in San Antonio.